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4	Las Vegas, Nevada 89118 Telephone (702) 893-3383		
5	Fax (702) 893-3789 Attorney for Allied Van Lines, Inc. and		
6	Berger Transfer and Storage, Inc.		
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8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
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11	MEGHAN KONECNE and HOWARD	Case No. 2:16-CV-01655-APG-GFW	
12	MISLE, individually and as husband and wife,	REQUEST TO EXTEND DEADLINE FOR	
13	Plaintiffs,	DEFENDANT'S RESPONSE TO PLAINTIFFS' MOTION FOR RELIEF	
	VS.	UNDER RULE 60(b) (ECF NO. 71)	
14	ALLIED VAN LINES, INC., a foreign corporation; BERGER TRANSFER &	(THIRD REQUEST)	
15	STORAGE, INC., a foreign corporation; and		
16	DOES I-V, ROES VI-X,		
17	Defendants.		
18			
19	The above-referenced parties, by and thr	ough their undersigned counsel of record, hereby	
20	agree and stipulate, subject to the Court's approval, to extend the deadline for Defendant Allied		
21	Van Lines, Inc. ("Defendant") to respond to Plaintiffs Megan Konecne's and Howard Misle's		
22	("Plaintiffs") Motion for Relief under FRCP 60(b) (ECF No. 71, filed on December 6, 2017). As		
23	the parties have set forth in their other stipulations (all approved by the Court), the parties still		
24	require additional time to finalize the settlement agreement. In the past week, the parties have		
25	conferred several times in an attempt to resolve the final form of their settlement agreement. As		
26	such, extending the due date for Defendant's res	sponse to Plaintiffs' Motion for Rule 60(b) Relief	

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(ECF No. 71) from January 23, 2018 to February 6, 2018 should afford the parties sufficient time

to finalize the agreement, thereby bringing this matter to a resolution and thus obviating the need

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1	for filing any responses.		
2	This is the parties' third request to extend the deadline by which Defendant may file a		
3	Response to Plaintiffs' Motion for Relief under Rule 60(b) (ECF No. 71).		
4	The proposed extension is requested in good faith and will not prejudice any party.		
5	IT IS SO STIPULATED.		
6	DATED this 23rd day of January 2018. DATED this 23rd day of January 2018.		
7	FENNEMORE CRAIG, PC LEWIS BRISBOIS BISGAARD & SMITH LLP		
8			
9	/s/ Brenoch R. Wirthlin /s/ Cheryl A. Grames BRENOCH R. WIRTHLIN, ESQ. CHERYL A. GRAMES, ESQ.		
10	Nevada Bar No. 10282 300 S. Fourth Street, Suite 1400 Nevada Bar No. 12752 6385 S. Rainbow Boulevard, Suite 600		
11	Las Vegas, NV 89101 Las Vegas, Nevada 89118		
12	Attorneys for Plaintiffs Attorneys for Defendants		
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14	IT IS SO ORDERED.		
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16	Dated: January 25, 2018.		
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18	UNITED STATES DISTRICT JUDGE		
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LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW 28

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